

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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FRONTIER COMMUNICATIONS :  
OF NEW YORK, INC. :

Plaintiff, :

v. :

Civil Action No. 07-CV-10327

INTERNATIONAL BROTHERHOOD OF :  
ELECTRICAL WORKERS, AFI-CIO, :  
LOCAL UNION 503, :

(Lynch, J.)  
(Eaton, M.J.)

Defendant. :  
-----X

**NOTICE OF UNOPPOSED MOTION**  
**FOR PRO HAC VICE ADMISSION OF THOMAS M. BECK**

FILED COURT  
U.S. DISTRICT COURT  
2007 FEB -1 PM 11:15  
S.D. OF N.Y.

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Wendy C. Butler, a member in good standing of the Bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of Thomas M. Beck. Mr. Beck is resident in the Washington, D.C. office of Jones Day, which is located at 51 Louisiana Avenue, N.W., Washington, DC 20001, (202) 879-3939 (telephone), (202) 626-1700 (facsimile). Mr. Beck is a member in good standing of the Bars of the Commonwealth of Virginia and the District of Columbia. There are no pending disciplinary proceedings against Mr. Beck in any State or Federal court. A declaration in support of this motion with an annexed exhibit is attached hereto. Counsel for Plaintiff has consulted with counsel for Defendant, and Counsel for Defendant consents to the motion.

Dated: February 1, 2008  
New York, New York

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Wendy C. Butler", written over a horizontal line.

Wendy C. Butler (WB-2539)

JONES DAY

222 East 41st Street

New York, New York 10017-6702

Tel: 212-326-3939

Fax: 212-755-7306

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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Plaintiff,	:
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ELECTRICAL WORKERS, AFI-CIO,	:
LOCAL UNION 503,	:
	:
Defendant.	:
-----X	

Civil Action No. 07-CV-10327

(Lynch, J.)  
(Eaton, M.J.)

**DECLARATION OF WENDY C. BUTLER IN SUPPORT OF UNOPPOSED MOTION  
FOR *PRO HAC VICE* ADMISSION OF THOMAS M. BECK**

Wendy C. Butler, pursuant to the provisions of 28 U.S.C. § 1746, states and declares as follows:

1. I am a member of the Bar of this Court and a partner at Jones Day, counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I submit this declaration in support of Plaintiff's application for an order granting Thomas M. Beck *pro hac vice* admission to this Court to participate in the above-captioned action, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York.

2. Mr. Beck is a partner at Jones Day. He was admitted to practice before the courts of the Commonwealth of Virginia in 1992 and the District of Columbia in 1993. Certificates of Good Standing issued by the Virginia State Bar, dated January 30, 2008, and the District of Columbia Court of Appeals, dated January 29, 2008, are attached hereto as Exhibit A. There are

no disciplinary proceedings against him in any jurisdiction. In addition, Mr. Beck is familiar with both Federal and Local Rules of Civil Procedure.

3. Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I request that Thomas M. Beck be permitted to appear *pro hac vice* for all purposes in connection with the above-captioned action.

4. Counsel for Plaintiff has consulted with counsel for Defendant, and Counsel for Defendant consents to the motion.


5. Because no novel issue of law is involved in this motion, I further request that this Court waive the requirement of a supporting memorandum of law pursuant to Rule 7.1 of the Local Rules of the United States District Court for the Southern District of New York.

6. I respectfully submit a proposed Order, which is attached hereto as Exhibit B, granting the admission of Mr. Beck.

7. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, it is respectfully requested that this Court grant Thomas M. Beck *pro hac vice* admission to the Bar of this Court for all purposes in connection with this case.

Dated: February 1, 2008  
New York, New York

  
Wendy C. Butler



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

Thomas M. Beck

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was on the 14<sup>th</sup> day of May, 1993,  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on January  
29, 2008.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

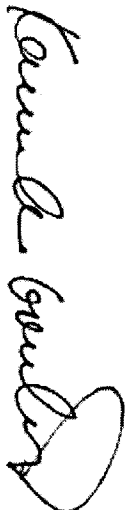


## VIRGINIA STATE BAR

### CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT THOMAS MARTIN BECK IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN  
GOOD STANDING. **MR. BECK** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 1, 1992**, AFTER  
SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued January 30, 2008

  
KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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INTERNATIONAL BROTHERHOOD OF	:	(Lynch, J.)
ELECTRICAL WORKERS, AFI-CIO,	:	(Eaton, M.J.)
LOCAL UNION 503,	:	
	:	
Defendant.	:	
-----X		

**ORDER FOR ADMISSION *PRO HAC VICE*  
ON WRITTEN MOTION**

Upon the Unopposed Motion of Plaintiff Frontier Communications of New York, Inc. for an Order pursuant to Rule 1.3(c) of the Rules of the United States District Court for the Southern District of New York granting *pro hac vice* admission to Thomas M. Beck in connection with the above-captioned action, and upon consideration of the motion and declaration in support thereof, it is hereby

**ORDERED** that Thomas M. Beck is granted *pro hac vice* admission to the Bar of this Court for the purpose of participating in this action.

Dated: \_\_\_\_\_, 2008  
New York, New York

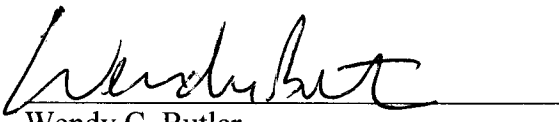
\_\_\_\_\_  
UNITED STATES DISTRICT/MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice of Motion Unopposed Motion for *Pro Hac Vice* Admission was delivered, by hand, on this 1<sup>st</sup> day of February 2008 to:

Vincent F. O'Hara  
Marion M. Lim  
HOLM & O'HARA LLP  
3 West 35<sup>th</sup> Street, 9<sup>th</sup> Floor  
New York, New York 10001

*Attorneys for Defendant International Brotherhood of Electrical  
Workers, AFL-CIO, Local Union 503*

  
Wendy C. Butler